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6 Attorneys for Defendant
7 LAUREL AVENUE, LLC

8 UNITED STATES DISTRICT COURT

9 CENTRAL DISTRICT OF CALIFORNIA, EASTERN DIVISION

10
11 SARA TORRES, an individual and on
behalf of all others situated,

12 Plaintiffs,

13 v.

14 LAUREL AVENUE, LLC, a Delaware
limited liability company; JEANNE
15 STEELE, an individual; and DOES 1-
100, inclusive,

16 Defendants.
17

Case No.

**NOTICE OF REMOVAL OF
ACTION; UNDER 28 U.S.C. §
1441(a) (FEDERAL QUESTION)**

[San Bernardino County Superior
Court, Case No. CIVSB2202708]

1 TO THE CLERK OF THE ABOVE-ENTITLED COURT AND TO
2 PLAINTIFF AND HER ATTORNEY OF RECORD:

3 PLEASE TAKE NOTICE that Defendant Laurel Avenue, LLC hereby
4 removes to this Court the state court action described below.

5 1. On February 8, 2022, Plaintiff Sara Torres ("Torres") filed a putative
6 class action complaint against Laurel Avenue, LLC ("Laurel Avenue") and Jeanne
7 Steele in the Superior Court of the State of California for San Bernardino County.
8 The complaint is captioned *Sara Torres v. Laurel Avenue, LLC, Jeanne Steele and*
9 *Does 1 through 100* (Case No. CIVSB2202708). A true and correct copy of the
10 Complaint, as well as the materials served by Torres with the Complaint, including
11 the Summons, is attached hereto as Exhibit A. Torres served a copy of the
12 Complaint and Summons on Laurel Avenue on March 22, 2022.

13 **JURISDICTION**

14 2. This action is a civil action of which this Court has original jurisdiction
15 under 28 U.S.C. § 1332, and is one which may be removed to this Court by Laurel
16 Avenue under 28 U.S.C. § 1441(a) in that it arises under the Fair Credit Reporting
17 Act, 15 U.S.C. §§ 1681, et seq. This Court has supplemental jurisdiction pursuant to
18 28 U.S.C. § 1337, over Torres' remaining claims for alleged violations of the
19 Investigative Consumer Reporting Agencies Act, Cal. Civ. Code § 1786.2(b) and
20 the Consumer Credit Reporting Agencies Act, Cal. Civ. Code § 1785.3(b), as they
21 are transactionally related.

22 **REQUIREMENTS FOR REMOVAL UNDER 28 U.S.C. § 1446**

23 3. All process, pleadings and orders received by Laurel Avenue in the
24 state court action, including the Complaint, are attached hereto as Exhibit A. *See* 28
25 U.S.C. 1446(a).

26 4. A Notice of Removal is timely filed if it is filed within 30 days of the
27 defendant's receipt of the initial pleading. *See* 28 U.S.C. § 1446(b). Laurel Avenue
28 received the initial pleading when it was served on March 22, 2022, making the

1 Notice of Removal due on April 21, 2022. This Notice of Removal is filed on April
2 21, 2022, within the time provided by 28 U.S.C. § 1446(b).

3 5. Laurel Avenue will promptly give notice of this Notice to Torres and
4 will file a copy of this Notice with the clerk of the San Bernardino Superior Court as
5 required by 28 U.S.C. § 1446(d).

6 6. Counsel for Laurel Avenue has confirmed that the only other defendant
7 named in the Complaint, Jeanne Steele, has not been served with the Complaint
8 and/or Summons at the time of the filing of this Notice. Counsel for Laurel Avenue
9 confirmed this fact by communicating directly with Ms. Steele on April 19 and
10 April 21, 2022. Unserved defendants are not required to join in this Notice of
11 Removal. 28 U.S.C. § 1446(b)(2)(A).

12 **CERTIFICATION OF INTERESTED PARTIES**

13 7. Pursuant to Civil L.R. 7.1 and Federal Rule of Civil Procedure 7.1, the
14 undersigned, counsel for Laurel Avenue certifies that the parties listed in Exhibit B
15 may have a pecuniary interest in the outcome of this case. These representations are
16 made to enable the Court to evaluate possible disqualification or recusal. The
17 Certification and Notice of Interested Parties will be separately filed following the
18 filing of this Notice.

19 **NOTICE OF RELATED CASES**

20 8. Pursuant to Civil L.R. 83-1.3, notice is hereby given that Laurel
21 Avenue is currently unaware of any related cases before the District Court for the
22 Central District of California.

23 WHEREFORE Laurel Avenue removes the original action brought by
24 Torres now pending in the San Bernardino Superior Court from the San Bernardino
25 Superior Court to the United States District Court for the Central District of
26 California, Eastern Division.

1 DATED: April 21, 2022

2 FINLAYSON TOFFER ROOSEVELT & LILLY LLP

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4 By /s/ T. Kevin Roosevelt
5 T. Kevin Roosevelt
6 Attorneys for Defendant
7 LAUREL AVENUE, LLC
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CERTIFICATE OF SERVICE

I am employed in the County of Orange; I am over the age of eighteen years and not a party to the within entitled action; my business address is 15615 Alton Parkway, Suite 270, Irvine, California 92618. I am a registered user of the CM/ECF system for the United States District Court for the Central District of California.

On April 21, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. To the best of my knowledge, all counsel to be served in this action are registered CM/ECF users and will be served by the CM/ECF system.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 21, 2022, at Irvine, California.

/s/ T. Kevin Roosevelt
T, Kevin Roosevelt